

ZACHARY W. CARTER Corporation Counsel

THE CITY OF NEW YORK LAW DEPARTMENT

100 CHURCH STREET NEW YORK, NY 10007-2601 Iván A. Méndez, Jr.
Assistant Corporation Counsel
Phone (212) 356-2450
Fax (212) 356-8760
Email imendez@law.nyc.gov

April 1, 2019

By ECF

Honorable John G. Koeltl United States District Court Southern District of New York 500 Pearl Street, Courtroom 12B New York, NY 10007-1312

John G. Koeltl, U.S.D.J.

APPLICATION GRANTED

SO ORDERED

Re: <u>Luc R. Pierre v. The City of New York et al.</u>, 17 Civ. 5782 (JGK)

Dear Judge Koeltl:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, attorney for defendants in the above-referenced action. I write, with the consent of plaintiff's counsel, to respectfully request that the defendants' deadline for making their motion for summary judgment be adjourned by four business days, from April 4 to April 10, 2019, and that plaintiff's deadline for filing his response, and the defendants' deadline to file their reply, be similarly extended by four business days, from May 13 to May 17, and from May 24 to May 30, 2019, respectively. This is the defendants' second such request. On March 15 the defendants requested, and the Court granted them, a two week extension of time to move for summary judgment.

Shortly after the Court granted defendants the prior extension, my wife and daughter fell extremely ill and I spent significant time out of the office caring for them, including visits to the hospital and doctors. I subsequently contracted a similar illness and was out of the office for several days while recovering. My absence from the office during this time necessitates my request for an additional four business days to complete and have my supervisors review the defendants' motion papers. The requested adjournment will not affect any other scheduled deadlines.

I thank the Court for its consideration of this request.

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Respectfully submitted,

Assistant Corporation Counsel

cc: LAW OFFICES OF K.C. OKOLI, P.C. Att: Kenechukwu Chudi Okoli

(By ECF)